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February 2, 2019

**VIA E-MAIL  
AND ECF FILING**

The Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*  
Case No. 09-50026 (MG)**

Dear Judge Glenn:

Counsel for New GM write to update the Court on New GM's efforts to voluntarily mediate and attempt to resolve pre-sale personal injury and wrongful death claims (the "Pre-Sale PIWD Claims"). See December 12, 2018 Letter [ECF No. 14384]; July 30, 2018 Letter [ECF No. 14377]; June 11, 2018 Letter [ECF No. 14328].

As mentioned in our December 12 letter, in November 2018, New GM conducted mediations with various PIWD Plaintiffs represented by plaintiffs' firms that had larger "dockets" (*i.e.*, in separate groups based on the law firms representing various PIWD Plaintiffs). As of such time, New GM had reached agreements in principle to settle three dockets involving a total of 156 Pre-Sale PIWD Claims, of which (i) 85 were filed both as late claims in this Court and as claims in the MDL Court, (ii) 66 were pending only as late claims in this Court, (iii) four were pending only in the MDL Court, and (iv) one was unfiled.

Yesterday, New GM reached an agreement in principle with plaintiffs represented by Hilliard Martinez Gonzalez LLP and Thomas J. Henry Law, PLLC to settle a fourth docket involving a total of 237 Pre-Sale PIWD claims, of which (i) 163 are filed both as late claims in this Court and as claims in the MDL court, (ii) 26 are pending only as late claims in this Court, (iii) 34 are pending only in the MDL Court, and (iv) 14 are unfiled.

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In sum, since November 2018, New GM has entered into agreements in principle involving a total of 393 PIWD claims, of which (i) 248 are filed both as late claims in this Court and as claims in the MDL Court, (ii) 92 are pending only as late claims in this Court, (iii) 38 are pending only in the MDL Court, and (iv) 15 are unfiled.

Each of these agreements concerns a confidential, private aggregate settlement that includes prerequisites to be met and, upon occurrence of those prerequisites, such claimants will withdraw their late claims in this Court and dismiss with prejudice their Pre-Sale PIWD Claims in the MDL Court or other forums as applicable.

Additional mediations and individual case negotiations will occur in the first quarter of 2019 after New GM evaluates information still being produced by certain of the plaintiffs' counsel regarding such claims. New GM will update the Court as more information becomes available. New GM remains committed to mediating and settling as many Pre-Sale PIWD Claims as possible, minimizing further litigation costs and burdens for this Court, the GUC Trust, the late claimants, and New GM.

Respectfully submitted,

/s/ Paul M. Basta

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